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May 26, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna Searcy Secretary Federal Communications Commission Room 222 1919 M Street NW Washington, DC 20554

Dear Ms. Searcy:

I am responding to the Federal Communications Commission Proposed Rule on "Metric Conversion of Tariff Publications and Supporting Information," CC Docket No. 93-53.

Among the options offered, the only one that comes close to meeting the goals of the Metric Conversion Act is option 2: "allowing the carrier to state in the applicable rate section of the tariff publication and in supporting information, the metric unit and corresponding rate in parenthesis beside the non-metric unit and rate." Including conversion tables as in options 1 and 3 is unacceptable because the metric system is not being *used*, as required, but is only being *referenced*.

The intent of the Metric Conversion Act is that the metric system become the "preferred system of weights and measures for United States trade and commerce." Relegating it to a parenthetical second-place in tariff publications hardly meets the requirement of being "preferred."

I recommend that the metric and non-metric units have equal status. The carrier should have the choice of which unit to put in parentheses. That way, the carrier can make the decision voluntarily to use metric units as the preferred units.